

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

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UNCENSORED AI, INC., a Delaware  
corporation,

Plaintiff,

CASE NO. 8:25-CV-00040

vs.

PERPLEXITY AI, INC.; START ENGINE  
CROWDFUNDING, INC.;  
UNCENSORED.COM; NOFILTERGPT,  
INC.; NASTIA CYBERNETICS; SAS;  
VENICE AI, INC.; FREEDOMGPT, INC.;  
UNCENSORED.AI.IO; AP SOFTWARE,  
LTD.; HENRY FORDIN KATU 5; CLINT  
NEILSON; CHAT UNCENSORED, INC.;  
and ERIC VORHEES

**DEFENDANT, STARTENGINE  
CROWDFUNDING, INC.'S RULE  
12(b) MOTION TO DISMISS THE  
AMENDED COMPLAINT**

Defendants.

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Defendant StartEngine Crowdfunding, Inc. ("StartEngine"), hereby moves, pursuant to Fed. R. Civ. P. 12(b)(1), (2), (5), and (6), to dismiss Plaintiff's Amended Complaint against it for lack of personal jurisdiction over StartEngine, failure to serve the summons upon StartEngine, and lack of subject matter jurisdiction over this dispute, as well as for failure to state a claim for which relief can be granted. As support for this Motion, a Memorandum and Index of Evidence are filed contemporaneously herewith.

WHEREFORE, StartEngine requests that it be dismissed from this case with prejudice, that the entire case be dismissed, and that the Court grant any other relief it deems just and equitable.

Dated this 2<sup>nd</sup> day of June, 2025.

STARTENGINE CROWDFUNDING, INC. A/K/A  
START ENGINE, INC., Defendant

By: /s/ Kristina J. Kamler

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Kristina J. Kamler, 24082  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 2, 2025, the foregoing was filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

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/s/ Kristina J. Kamler